

EXHIBIT B

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Case 2:20-mc-00170-KSH-CLW Document 28-2 Filed 10/25/22 Page 2 of 5 PageID: 172

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Carl J. Dallarda
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August 16, 2022

VIA FIRST CLASS MAIL

Scott C. Levinson, Esq.
231 Oakdene Avenue
Cliffside Park, NJ 07010

Re: KeyBank v. Direct Building Products Corp. and Yoel Deen
Case No.: DNJ-2:20-mc-00170-KSH-CLW

Dear Mr. Levinson,

As you know, this office represents KeyBank National Association in the above referenced case. My office has not yet received the documents that were listed on the Notice of Deposition, which Mr. Deen failed to produce at his June 27th deposition. Please provide same. I enclose a copy of the document list from the Notice of Deposition for your convenience.

Additionally, please provide the following items referenced at the deposition:

1. The lease with Joseph Rubin for the rental property
2. A copy of mortgage documents for the mortgages with TD Bank and M & T Bank
3. A copy of the settlement/transfer agreement with Abraham Ekstein
4. A copy of the purchase contract for the 2019 Toyota Highlander
5. A copy of the agreement to transfer 6 Nancy Lane to Nancy Lane LLC

Thank you for your cooperation.

Very truly yours,

WONG FLEMING, P.C.
Attorneys for plaintiff

/s/ Carl J. Dallarda
Carl J. Dallarda, Esq.

CD/bm
File No. 2169.0623
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ATTORNEYS ADMITTED SOLELY IN THE JURISDICTION WHERE LISTED OFFICE IS LOCATED, UNLESS OTHERWISE NOTED

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

KEYBANK NATIONAL ASSOCIATION,

Plaintiff,

v.

DIRECT BUILDING PRODUCTS CORP.,
and YOEL DEEN,

Defendants.

Civil Action No.: 2:20-mc-00170-KSH-
CLW

**NOTICE OF DEPOSITION
(DOCUMENT LIST)**

TO: **Scott C. Levenson, Esq.**
slevensonesq@gmail.com
231 Oakdene Avenue
Cliffside Park, NJ 07010
Attorney for Yoel Deen and Direct Building Products Corp.

PLEASE TAKE NOTICE that the following documents shall be produced:

Any and all documents relating to the Defendant's financial condition, including but not limited to:

- 1) Complete, current, and accurate lists, schedules, and records of the judgment debtor's outstanding notes receivable, accounts receivable, and all other receivables which records indicate, among other things, the amounts owing thereon and from whom such amounts are owing;
- (2) Complete, current, and accurate lists, schedules, and records of the judgment debtor's equipment, motor vehicles, furniture, inventory, furnishings, supplies, and other tangible assets of every kind and description, whether real or personal, current depreciation schedules, if any, relating thereto, and complete, current, and accurate lists of liens or other encumbrances thereon;
- (3) Complete, current, and accurate lists, schedules, and records of all the judgment debtor's stocks, bonds, shares, or interest in all liquid assets or other similar funds, shares or interest in all mutual funds, proprietorship interests, general or limited partnership interests, and all other intangible assets and the corresponding values assigned thereto;
- (4) Complete, current, and accurate copies of profit and loss statements, income statements, capital statements, balance sheets, and other such similar documents, regardless of how the same may be designated for accounting purposes, relating to every sole proprietorship, and every business concern or venture in which the judgment debtor is or has been with the past five (5) years a general

or limited partner or the holder of five percent (5%) or more of the outstanding stock of said concern;

(5) Complete and accurate copies of the judgment debtor's federal and state(s) income and state(s) personal property tax returns which the judgment debtor has filed or should have filed with the appropriate government authorities for his five (5) most recent taxable years;

(6) Complete, current, and accurate lists, schedules, and records indicating the judgment debtor's place(s) of banking, the types of bank accounts (savings, checking, or similar bank accounts) and the account numbers and designations of authority relating thereto for the last five (5) years. As used herein, the term "bank accounts" shall also include all certificates of deposit, savings bonds, and similar instruments, as well as safe deposit boxes and lists, schedules, and records of the contents thereof; and estate with respect to which the judgment debtor is lessor, lessee, or owner, whether in whole or in part;

(7) Complete and accurate copies of any credit card account statements for the past five (5) years;

(8) Complete, current, and accurate lists, schedules, and records indicating any and all leases of or deeds to real estate with respect to which the judgment debtor is lessor, lessee, or owner, whether in whole or in part.

(9) All documents evidencing sales, loans, assignments, leases, transfers and/or other conveyances of tangible or intangible assets, by the judgment debtor within the last five (5) years.

Please contact the noticing attorney at least five (5) calendar days prior to the deposition to advise that it is your desire to appear via this remote participating means so that the necessary credentials, call-in numbers, testing and information, if necessary, can be provided to you prior to the proceedings.

Dated: August 16, 2022

WONG FLEMING

Carl J. Dallarda
Carl J. Dallarda, Esq.
*Attorneys for Plaintiff KeyBank
National Association*